

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

ROYAL INDEMNITY COMPANY,

Plaintiff,

v.

PEPPER HAMILTON LLP, W. RODERICK
GAGNE', FREED MAXICK & BATTAGLIA
CPAs, McGLADREY & PULLEN LLP, and)
MICHAEL AQUINO,

Defendants.

C.A. No. 05-165-JJF

CHARLES A. STANZIALE, JR.,
Chapter 7 Trustee of Student Finance
Corporation,

Plaintiff,

v.

McGLADREY & PULLEN LLP and
MICHAEL AQUINO,

Defendants.

C.A. No. 05-72-JJF

CHARLES A. STANZIALE, JR.,
Chapter 7 Trustee of Student Finance
Corporation,

Plaintiff,

v.

PEPPER HAMILTON LLP, et al.,

Defendants.

C.A. No. 04-1551-JJF

MBIA INSURANCE CORPORATION and)	
WELLS FARGO BANK, N.A. (f/k/a WELLS)	
FARGO BANK MINNESOTA N.A.) as)	
TRUSTEE OF SFC GRANTOR TRUST,)	
SERIES 2000-1, SFC GRANTOR TRUST,)	
SERIES 2000-2, SFC GRANTOR TRUST,)	
SERIES 2000-3, SFC GRANTOR TRUST,)	C.A. No. 02-1294-JJF
SERIES 2000-4, SFC GRANTOR TRUST,)	
SERIES 2001-1, SFC GRANTOR TRUST,)	
SERIES 2001-2, SFC OWNER TRUST 2001-I,)	
AND SFC GRANTOR TRUST, SERIES 2001-3,)	
)	
Plaintiffs/Counterclaim Defendants,)	
)	
v.)	
)	
ROYAL INDEMNITY COMPANY,)	
)	
Defendant/Counterclaim Plaintiff.)	
)	

**PLAINTIFF ROYAL INDEMNITY COMPANY'S
EMERGENCY MOTION TO COMPEL**

For the reasons more fully set forth in the accompanying memorandum and Declaration of Robert W. Gifford, Royal Indemnity Company ("Royal") hereby moves, pursuant to Rules 26 and 37 of the Federal Rules of Civil Procedure, to compel Pepper Hamilton LLP ("Pepper") to produce certain documents and information considered by two of Pepper's expert witnesses, Professor Geoffrey Hazard, Jr. and Mr. Peter Humphreys, in forming their expert opinions. The documents and information specifically sought by Royal were described by Prof. Hazard and Mr. Humphreys at their respective depositions, and are identified to the extent possible in the accompanying memorandum.

In compliance with D. Del. LR 7.1.1, Royal has made a reasonable effort to reach agreement with respect to the subject matter of this motion but was unable to do so.

ASHBY & GEDDES

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/s/ Tiffany Geyer Lydon

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